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8
9 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,

Case No. 2:20-mj-00967-EJY

11 v.
12 Plaintiff,

Stipulation for an Order
Directing Probation to Prepare
a Criminal History Report

13 OMAR GONZALEZ-HERNANDEZ,
aka “Omar Gonzalez-Herrera,”
aka “Omar Gonzalez,”
aka “Marcos Torre-Blanca,”
aka “Marcos Torreblanca,”
aka “Marcus Torreblanca-Gonzalez,”
aka “Marcus Gonzalez-Torrebl,”

14
15
16 Defendant.
17

18 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
19 Trutanich, United States Attorney, and Jared L. Grimmer, Assistant United States
20 Attorney, counsel for the United States of America, and Brandon C. Jaroch, Assistant
21 Federal Public Defender, counsel for Defendant OMAR GONZALEZ-HERNANDEZ,
22 that the Court direct the U.S. Probation Office to prepare a report detailing the defendant’s
23 criminal history.
24

This stipulation is entered into for the following reasons:

1. The United States Attorney's Office has developed an early disposition program for immigration cases, authorized by the Attorney General pursuant to the PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has extended to the defendant a plea offer in which the parties would agree to jointly request an expedited sentencing immediately after the defendant enters a guilty plea.

2. The U.S. Probation Office cannot begin obtaining the defendant's criminal history until after the defendant enters his guilty plea unless the Court enters an order directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of a defendant's initial appearance when charged by indictment.

3. The U.S. Probation Office informs the government that it would like to begin obtaining the criminal history of defendants eligible for the early disposition program as soon as possible after their initial appearance so that the Probation Office can complete the Presentence Investigation Report by the time of the expected expedited sentencing.

4. Accordingly, the parties request that the Court enter an order directing the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

DATED this 9th day of November, 2020.

Respectfully submitted,

NICHOLAS A. TRUTANICH
United States Attorney

/s/ Brandon C. Jaroach
BRANDON C. JAROCH
Assistant Federal Public Defender
Counsel for Defendant OMAR
GONZALEZ-HERNANDEZ

/s/ Jared L. Grimmer
JARED L. GRIMMER
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:20-mj-00967-EJY

Plaintiff,

Order Directing Probation to Prepare a Criminal History Report [Proposed]

OMAR GONZALEZ-HERNANDEZ,
aka "Omar Gonzalez-Herrera,"
aka "Omar Gonzalez,"
aka "Marcos Torre-Blanca,"
aka "Marcos Torreblanca,"
aka "Marcus Torreblanca-Gonzalez,"
aka "Marcus Gonzalez-Torrebl,"

Defendant.

Based on the stipulation of counsel, good cause appearing, and the best interest of justice being served:

IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history.

DATED this 10th day of November, 2020.

Elayna J. Youchah
HONORABLE ELAYNA J. YOUCAH
UNITED STATES MAGISTRATE JUDGE